

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

JENNY R. RODRIGUEZ
DEBTOR(S)

CASE NO. 09-10091 SEK

CHAPTER 13

MOTION TO OBJECT CLAIM NUMBER 7
FILED BY
HSBC BANK, NEVADA (BEST BUY, INC.)

TO THE HONORABLE COURT:

COMES NOW, DEBTOR through the undersigned attorney and respectfully ALLEGES, STATES, AND PRAYS:

1. On March 10, 2010, HSBC Bank Nevada (Best Buy, Inc.) filed claim number 7 as a secured claim.
3. Debtor object claim number 7, because it's not supported by adequate written documents, notes credit applications, account statement, or any other type of written or printed document that sufficiently supports or proves that the claim is secured. Also if there is a lien is over a property that does not belong to the Debtor. Sufficient evidence should be provided to allow counsel to contest the claim if necessary under 11 U.S.C § 502, the Debtor has the right to object to a claim based upon any defense available.

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WHEREFORE, it is respectfully requested from this Honorable Court that based on the above facts, claim number 7 be allowed as an unsecured claim. .

NOTICE

Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U. S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may – in its discretion-schedule a hearing.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF Filing System which will send a notification, upon information and belief, of such filing to the Chapter 13 Trustee, to the US Trustee and to all subscribed users. We will serve by regular mail this document to any creditor as per master address list upon knowing that they are non CM/ECF participants including, HSBC Bank Nevada, (Best Buy Co., Inc.) at Bass & Associates, P.C 3936 E. Ft Lowell Suite 200, Tucson, AZ 85712.

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RESPECTFULLY SUBMITTED.

In San Juan Puerto Rico, this 13th day of May, 2010.

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